

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE

BIG LOTS, INC., et al.,

Debtor.

Chapter 11

Case No. 24-11967-JKS

(Jointly Administered Requested)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Red Mountain Asset Fund I, LLC, a Delaware limited liability company (“Red Mountain”), Desert Sky Esplanade, LLC, an Arizona limited liability company (“Desert Sky”), and Clovis I, LLC, a California limited liability company (“Clovis”), by and through their counsel, Ervin Cohen & Jessup LLP hereby requests pursuant to Bankruptcy Code § 1009(b) and Bankruptcy Rules 2002, 3017, 4001, and 9007 that notice of all matters which may come before the Court be given as follows:

Red Mountain
Desert Sky
Clovis
c/o Byron Z. Moldo, Esq.
Ervin Cohen & Jessup LLP
9401 Wilshire Boulevard, 12th Floor
Beverly Hills, CA 90212

PLEASE TAKE FURTHER NOTICE that Red Mountain, Desert Sky, and Clovis hereby request that they be included on the official mailing matrix and all limited notice or service lists authorized by the Court in this Case.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, complaints, demands, replies, answers, hearings, motions, petitions, requests, operating reports, plans of reorganization, disclosure statements, including all amendments

of any of the foregoing and any other documents brought before the Court in this case, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, email, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Red Mountain, Desert Sky, or Clovis' (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable in any case, controversy or adversary proceeding; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Red Mountain, Desert Sky, or Clovis is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: September 11, 2024

ERVIN COHEN & JESSUP LLP

By: /s/ Byron Z. Moldo
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Esplanade, LLC, an Arizona limited liability
company, and Clovis I, LLC, a California limited
liability company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 11, 2024, a copy of the foregoing document was served on the parties electronically via the Court's ECF System.

/s/ Debbie A. Perez